

Exhibit P

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*Attorneys for Defendants Watchtower Bible and Tract Society of New York, Inc.,
and Watch Tower Bible and Tract Society of Pennsylvania*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA
MAPLEY,

Plaintiffs,

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC., WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA, and BRUCE
MAPLEY SR.,

Defendants.

Cause No. CV 20-52-BLG-SPW

**AFFIDAVIT OF
PHILIP BRUMLEY, ESQ.**

STATE OF NEW YORK)
 :SS
County of Putnam)

I, Philip Brumley, first being duly sworn, hereby depose and state:

1. I am General Counsel for defendant Watch Tower Bible and Tract Society of Pennsylvania. ("WTPA").

2. In this role, I have direct knowledge of the information contained in this Affidavit.

3. WTPA is a non-profit religious membership corporation formed in 1881 under the non-profit corporation laws of the State of Pennsylvania.

4. WTPA's registered office is located at 1 Kings Drive, Tuxedo Park, New York.

5. WTPA has its own assets, liabilities, offices, board of directors, and officers, separate from every other entity used by Jehovah's Witnesses.

6. WTPA is not the direct or indirect parent or subsidiary of any other corporation involved in this action.

7. WTPA does not have (and never has had) offices in Montana, does not own assets in Montana, and does not have employees in Montana.

8. WTPA does not conduct business in Montana, and is not and never has been registered to carry on business in Montana.

9. WTPA has no agent for service of process in Montana.

10. WTPA has no contact with congregations of Jehovah's Witnesses located in Montana.

11. WTPA does not establish or disseminate policy or procedure to congregations of Jehovah's Witnesses in Montana.

12. WTPA does not appoint or remove elders, ministerial servants or publishers in congregations of Jehovah's Witnesses in Montana.

13. WTPA exists to provide certain business needs of Jehovah's Witnesses including, among other things, holding copyright to books, magazines, songs, and videos. It also provides international humanitarian aid to communities after natural disasters.

14. The publications to which WTPA owns copyrights include *The Watchtower* and *Awake!* magazines, as well books, tracts and brochures that are used to explain various aspects of the Bible.

15. WTPA does not author the substantive content or print hard copies of the books, magazines, brochures and tracts referred to above.

16. On the contrary, the copyrighted materials are published by co-defendant Watchtower Bible and Tract Society of New York, Inc. (hereinafter "WTNY"), a separate corporation.

17. WTNY was organized and exists under the laws of the State of New York as a not-for-profit religious corporation. Its headquarters are in Wallkill, New York.

FURTHER THIS AFFIANT SAYETH NAUGHT.

DATED this 19th day of June, 2020.

By: Philip Brumley
Philip Brumley, Esq.

SUBSCRIBED and SWORN to before me by Philip Brumley, Esq., this
19th day of June, 2020.

By: Benjamin D. Mullins
Notary Public for the State of New York

BENJAMIN D. MULLINS
Notary Public, State of New York
No. 01MU6314626 Qualified in Putnam County
Certificate filed in New York County
Commission expires November 10, 2022

ATTACHED 3 PAGES
BEAR EMBOSSEMENT.